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ROBERT B. STEWART
PRESIDENT

NATIONAL July 29, 1997

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Ms. Kumkum Ray
Engineering and Operations Branch
Minerals Management Service
381 Elden Street, Mail Stop 4700
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ATTN: Rules Processing Team

VIA FAX (703) 787-1093

RE: Minerals Management Service Proposed Rule on Geological and
Geophysical (G&G) Explorations of the Outer Continental Shelf. 62
Federal Register 28 (February 11, 1997)

Dear Ms. Ray:

The National Ocean Industries Association (NOIA) is pleased to respond to the
above referenced proposal.

NOIA represents more than 270 member companies involved in all aspects of the
exploration and production of the nation's Outer Continental Shelf (OCS) oil and
natural gas resources. Our membership includes oil and natural gas producers (major
as well as independent), oil field service companies, contractors, equipment
manufacturers and others who rely in whole or in part on the federal OCS leasing and
development program for the business livelihood. This membership has a direct
interest in the MMS proposal as geological and geophysical (G&G) activities are an
integral component to any offshore exploration and development operations.

NOIA believes the proposed regulations have the potential to adversely impact the
way offshore oil and gas exploration is conducted on the OCS. The MMS proposal,
if adopted, would change the competitive nature of the offshore industry, expose
proprietary technology and upset the business foundation upon which a balanced and
predictable federal offshore leasing and development program has been developed.

NOIA wishes to endorse those detailed comments submitted by the International
Association of Geophysical Contractors (IAGC) and urges the MMS to give them the
most serious form of consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert B. Stewart", is written over a horizontal line.

Robert B. Stewart